

186

**Subject:** STIP Comment Addendum  
**From:** George Matz <geomatz@alaska.net>  
**Date:** Sat, 31 Dec 2005 09:46:09 -0900  
**To:** DOT\_STIP@dot.state.ak.us  
**CC:** Senator\_Gary\_Stevens@legis.state.ak.us, Rep\_Paul\_Seaton@legis.state.ak.us

Cook Inlet Alliance  
PO Box 2421  
Homer, AK 99603

Alaska Department of Transportation and Public Facilities  
Statewide Planning Office  
Division of Program Development  
3132 Channel Drive, Suite 200  
Juneau, AK 99801-7898

December 31, 2005

Re: STIP Comments Addendum

Dear DOT&PF:

Yesterday, the Cook Inlet Alliance provided comments on the Williamsport/Pile Bay Road project in DOT&PF's Draft 2006-2008 Alaska Statewide Transportation Improvement Program (STIP). After reviewing our comments, we would like to submit an important addendum.

The STIP treats the Williamsport/Pile Bay Road project as an independent project, but provides virtually no information as to how this project complies with state cost effectiveness regulations or the federal National Environmental Policy Act (NEPA). However, the Southwest Alaska Transportation Plan considers this project to be a key segment in the proposed Cook Inlet to Bristol Bay Corridor and does provide an analysis of the cost and effectiveness of each segment. We assume that DOT&PF will use this analysis to apply to the STIP. Also, because the STIP project description refers to the Williamsport/Pile Bay Road as a rehabilitation project, it appears that DOT&PF does not think the project needs an Environmental Impact Statement (EIS) in order to comply with NEPA.

The conundrum is:

1. As an independent project, the Williamsport/Pile Bay Road is not cost effective. The Southwest Alaska Transportation Plan states that the annual costs of the Williamsport-Pile Bay Road total \$2,786,800 and that it will result in an annual savings of \$3,848,400, making it appear to be cost-effective. The problem is that only the \$1,082,500 of savings attributed to portaging boats by the gillnet fleet can be legitimately claimed if this is an independent project (and even that is questionable), covering slightly more than a third of the costs. The \$2,765,900 in savings attributed to cargo can only be realized if the Pile Bay end of the road is connected to what will have to be a new road, such as the proposed Cook Inlet to Bristol Bay Corridor, in order to delivery the freight and savings to the intended villages.

2. If, in order to be cost-effective, the Williamsport/Pile Bay Road is considered a key segment in the proposed Cook Inlet to Bristol Bay Corridor, it will need an EIS. The proposed Cook Inlet to Bristol Bay Corridor would be a major new highway that has the potential of impacting world acclaimed fish and wildlife resources of significant commercial and subsistence value. It seems certain that these possible impacts, as well as the possibility of conflicts generated by new access, would require a major EIS in order to comply with NEPA, although the Southwest Alaska Transportation Plan is silent on this consideration. It appears that DOT&PF prefers to ignore the issue, but that can only be considered temporary. We note that the cover

letter to the Southwest Alaska Transportation Plan states that "This revision was produced in response to a legal decision" in which DOT&PF failed to follow the law in a related project in the region.

As we said in our earlier letter, DOT&PF's web site states that, "The STIP displays the projects the department plans to design and build in each of the next three years." However, given the conundrum that exists with the Williamsport/Pile Bay Road project, we don't think DOT&PF is ready for "design and build" and that it should reassess having this project in the STIP.

Sincerely,

George Matz  
Cook Inlet Alliance Issues Coordinator

cc Governor Frank Murkowski  
Senator Gary Stevens  
Representative Paul Seaton  
Tim Haugh, FHWA

**STIP Comment addendum.doc**

**Content-Type:** application/msword  
**Content-Encoding:** base64